

**PC SCAN**

(If you need additional space for ANY section, please attach an additional sheet and reference that section.)

**RECEIVED**

12/14/2020

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THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT**FILED**

1/14/2021

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN ~~SECTION~~ DIVISION

ERIC E. BERNARD

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: 20 CV 50412  
(To be supplied by the Clerk of this Court)

ILLINOIS DEPARTMENT OF CORRECTIONS

ROB JEFFREYS,

SONJA NICKLAUS,

WEXFORD HEALTH SOURCE

AMBER ALLEN,

ANDREA TACK

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

## CHECK ONE ONLY:

AMENDED COMPLAINT☒COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)☐COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

JUSTIN WILKS,  
MELISSA YOUNG,  
MONICA CARPENTER,  
DACIA HUTCHISON  
JANET BROWN,  
CARLOS FLORES,  
ANN GANGER,  
JESSICA OLSON,  
MERRILL ZAHTZ,  
JACQUELYNN TOBIASZ,  
CNA RUSSELL,  
CNA FELDER,  
CNA L. BARLOW,  
CECELIA GROSSMAN,  
TEEA LEWIS,  
H. SPENCER,  
SGT. PHILLIPS,  
NURSE HEFERFINGER,  
QUINCY KIMBLE,  
COUNSELOR MRS. JOHNSON,  
TAYLOR GEE

JOHN DOE,  
JANE DOE.

DEFENDANTS.

All DEFENDANTS ARE BEING SUED IN BOTH THEIR OFFICIAL CAPACITY AND INDIVIDUAL CAPACITY.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**I. Plaintiff(s):**

- A. Name: ERIC BERNARD
- B. List all aliases: TERRELL KING
- C. Prisoner identification number: R25398
- D. Place of present confinement: DIXON FACILITY
- E. Address: 2600 N. BRINTON AVE  
DIXON ILLINOIS 61021

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: ILLINOIS DEPARTMENT OF CORRECTIONS  
Title: ENTITY CORPORATION  
Place of Employment: 1301 CONCORDIA COURT  
SPRINGFIELD, IL 62794
- B. Defendant: ROB JEFFERSON  
Title: J.D.O.C. DIRECTOR  
Place of Employment: 1301 CONCORDIA COURT  
SPRINGFIELD, IL 62794
- C. Defendant: WEXFORD  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

SONJA NICKIVAS (WARDEN)

ANDREA TACK (WARDEN)

AMBER ALLEN (MEDICAL ADMINISTRATOR)

JUSTIN WILKS (WARDEN)

MELISSA YOUNG (WEXFORD UNIT SUPERVISOR)

MONICA CARDENTER (DIRECTOR OF NURSING)

DACIA HUTCHISON (NURSE SUPERVISOR)

JANET BROWN (MEDICAL SUPERVISOR)

CARLOS FLOR (PHYSICIAN)

MERRILL ZAHTZ (MEDICAL DIRECTOR)

ANN GANGER (UNIT LT. SUPERVISOR)

JACQUELINE TOBIASZ (CNA SUPERVISOR)

CNA MRS. RUSSELL (CERTIFIED NURSE ASSISTANT)

CNA MS. FELDER (CERTIFIED NURSE ASSISTANT)

L. BARLOW (CERTIFIED NURSE ASSISTANT)

CECELIA GRASSMAN (CERTIFIED NURSE ASSISTANT)

TEEA LEWIS (CERTIFIED NURSE ASSISTANT)

NURSE MS. HEFERINGER (UNIT NURSE)

NURSE MRS. SPENCER (UNIT NURSE SUPERVISOR)

QUINCY KIMBLE (UNIT NURSE)

SGT. PHILLIPS (UNIT SGT. SUPERVISOR)

OFFICER BRADY (UNIT OFFICER)

OFFICER POTTINGER (UNIT OFFICER)

OFFICER SKOLI, (UNIT OFFICER)

JACOB CASSIDY (UNIT OFFICER)

JACOB WOLSONOWICH (UNIT OFFICER)

JOHN DOES (UNKNOWN)

JANE DOES (UNKNOWN)

TAYLOR GEE, MRS. JOHNSON (UNIT ADVOCATING COUNSELORS)

ALL DEFENDANTS PLACE OF EMPLOYMENT IS AT DIXON CORRECTIONAL CENTER.

ALL DEFENDANTS ARE BEING SUED IN BOTH THEIR OFFICIAL CAPACITY AND INDIVIDUAL CAPACITY



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: BERNARD v. DDC STAL 20CV-5346
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC BERNARD  
ALIAS TERRELL KANE
- D. List all defendants: DDC, TERRILL JEFFREYS, MILES,  
WILLIAMS, BARNES, JANE DOES, JOHN DOES OTHER  
DEFENDANTS.
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JOHN ROBERT BLAKER
- G. Basic claim made: 8th 14th AMENDMENT VIOLATIONS
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: UNKNOWN

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

SEE ATTACHMENT LITIGATION HISTORY 18 PAGES.

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Revised 9/2007

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

## V. Statement of Claim:

State here as briefly as possible the facts of your case. Describe precisely how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Plaintiff is an inmate of the P.D.D.C. whose at Dixon facility since 9-6-19 in the health care unit infirmary under full self care assistance and is diagnosed as an disabled person who is in need of accommodations for programs, services, daily activities and self care treatment. Dixon facility offers all inmates to participate in visitation (from family, friends attorneys) in person and by video on line visits; Religious services; educational programs; recreation (yard, gym, day room, out of cell unstructured time); telephone access; mental health group therapy; law library; dental care etc but plaintiff and other self care inmates are denied to participate in these daily activities, programs services based solely on his/her disability and no reasonable accommodations have been made. For example, the telephones in the infirmary is inside a sit in booth where plaintiff can't get to the dial pad and the receiver barely fits out the booth to reach plaintiff ear, plaintiff request that the booth be removed or another phone be installed so plaintiff can have access to phone.

WITHOUT STRAINING HIS NECK, ~~AND~~ <sup>IN</sup> PERSON VISITATION ARE HELD <sup>IN</sup> THE VISITING STATION, HOWEVER, ACCOMMODATION CAN BE MADE FOR VISITORS TO COME <sup>INSIDE</sup> THE FACILITY <sup>IN</sup> THE INFIRMARY (WHERE PLAINTIFF <sup>IS</sup> HOUSED) NO REASONABLE ACCOMMODATIONS WAS MADE; VIDEO VISITATION <sup>IS</sup> A MACHINE THAT FACES UPWARD FOR <sup>INMATES</sup> WHO CAN SIT UP <sup>IN</sup> A CHAIR AND <sup>IS</sup> CLOSED <sup>IN</sup> A CORNER FACING THE WALL, PLAINTIFF'S GERI CHAIR CAN NOT FIT <sup>IN</sup> FRONT OF THE MACHINE NOR CAN HE REACH THE PHONE CONNECTED TO THE MACHINE NOR CAN THE VISITORS SEE HIM BECAUSE THE SCREEN ON THE MACHINE ONLY FACES TOWARDS THE CEILING AND CANT ADJUST, HOWEVER, THERE <sup>IS</sup> A BRAND NEW PORTABLE MACHINE ON <sup>THE</sup> UNIT BUT <sup>IT</sup> HAS NEVER BEEN USED, PLAINTIFF MADE REQUEST TO USE THE PORTABLE VIDEO MACHINE BUT NOTHING HAPPENED AND NO OTHER ACCOMMODATIONS WAS MADE.

DENTAL CARE <sup>IS</sup> AVAILABLE AT THE FACILITY BUT PLAINTIFF <sup>IS</sup> BEING DENIED DENTAL CARE BECAUSE PORTABLE DENTAL X RAY MACHINES, OR DENTAL CHAIRS FOR DISABLED <sup>INMATES</sup> LIKE PLAINTIFF, <sup>ARE NOT AVAILABLE AT THE FACILITY</sup> PLAINTIFF REQUESTED TO GO TO AN OUTSIDE DENTAL CENTER.

FOR DENTAL CARE OR TO ORDER PORTABLE X-RAY AND ADA DENTAL CHAIRS BUT NO ACCOMMODATIONS WAS MADE AT ALL AND PLAINTIFF HAS CAVITIES, DECAYING TEETH, EXPOSED NERVES, BROKEN TOOTH WITH HARD WIRE STICKING OUT.

RELIGIOUS SERVICE, GROUPS, RECREATION, LAW LIBRARY AND OTHER PROGRAMS, SERVICES AND DAILY ACTIVITIES THAT ARE AVAILABLE, DEFENDANTS CLAIMS THAT GERI CHAIRS AT THE FACILITY <sup>IS</sup> OLD AND UNSAFE TO TAKE THE PLAINTIFF OUTSIDE THE INFIRMARY AND ALSO SHORT STAFF. PLAINTIFF REQUESTED DEFENDANTS TO ORDER NEW AND SAFE GERI CHAIRS AND EMPLOYEES MORE STAFF OR MAKE REASONABLE ACCOMMODATIONS BUT NONE WAS MADE AND HIS REQUEST WAS DENIED



Self care inmates are housed in the infirmary for self care reasons only, however, the unit is designed for inmates with serious medical conditions and needs observation, there is only one nurse, officer and certified nurse assistant (CNA) on each shift. The unit officer has to be present at all times when inmates, nurses and CNA have make contact, there are over twenty inmates housed in the infirmary, only seven of those inmates require self care assistance, the remaining inmates are there from broken bones, temporary observation, four point restraint observation, up to life support machines. On a daily basis self care inmates are not receiving daily ADL's because the unit officer is occupied with other situation with other regular inmates, leaving the CNA unable to do their job in providing care for their primary patients (self care inmates). Defendants don't have a setting in the prisons in Illinois for self care inmates where their self care needs can be met. Plaintiff and his attorney Amanda Anthot (advocating attorney for the disabled) has made several request for accommodations such as for the defendants to create a unit for self care inmates only, send self care inmates to some type of nursing homes or simply assign additional CNAs and officers to the infirmary for self care inmates only to guarantee that self care inmates are receiving the proper care and daily living scheduled ~~procedures~~ routines etc. No actions was taken by the defendants nor ~~do~~ was there any reasonable accommodations.

Defendants Robb Jeffreys, Sonja Nicklaus, Amber Allen, Melissa Young, Warden Tack, Warden Mills, ADA Coordinator D.D.C, <sup>Wexford Health Source,</sup> ~~Monica Hutchison~~ <sup>Dacia</sup> Hutchison, Monica Carpenter, Merrill Zathz, Carlos Fior Tobiasz, Brown, Ganger, Olson, Russell, Barlow, Grossman, Lewis, Spencer, Felder, Phillips Heferfinger, are responsible for making reasonable accommodations and recommendations for plaintiff and other self care inmates.

In addition, the defendants refuses to order new ADA equipment/devices such as hoist lift, geri chairs, emergency call buttons, medical beds, food trays etc. (all of the current ADA equipment is broken or falling apart) it's been like this since 9-6-19 to present date and this has been an ongoing issue with all of the allegation against all of the defendants since plaintiff arrival at Dixon facility.

CLAIM #1AMERICANS WITH DISABILITIES ACT

- JOINED WITH -

CLAIM #2REHABILITATION ACT

PLAINTIFF IS AN QUALIFIED DISABLED INMATE WHO HAS BEEN SUBJECTED TO DISCRIMINATION (BY THE NAMED DEFENDANTS IN THIS COMPLAINT) BASED ON HIS PHYSICAL DISABILITIES AND HAS BEEN DENIED PROGRAMS, SERVICES, DAILY ACTIVITIES, DENTAL AND PROPER SELF CARE ASSISTANCE BASED ON HIS DISABILITIES AND DEFENDANTS REFUSED TO MAKE REASONABLE ACCOMMODATIONS. IN VIOLATION OF AMERICANS WITH DISABILITIES ACT AND THE REHABILITATION ACT.

CLAIM #3

DELIBERATE INDIFFERENCE TO A SERIOUS MEDICAL NEED  
FAILURE TO PROTECT IN VIOLATION OF THE 8TH AMENDMENT OF THE  
US CONSTITUTION

DEFENDANTS ARE AWARE THAT PLAINTIFF SELF CARE NEEDS REQUIRES ADA ASSISTIVE EQUIPMENT AND ADA DEVICES, MEDICAL BEDS, GERI CHAIRS, HOYER LIFT.

DEFENDANTS ARE AWARE THAT THE HOYER LIFT IS MALFUNCTIONING AND UNSAFE AS WELL AS THE GERI CHAIRS BUT ORDER NURSES AND CNA TO OPERATE THE HOYER LIFT AND GERI CHAIRS ON PLAINTIFF, WHICH RESULTED IN PLAINTIFF BEING INJURED OVER TWENTY TIMES. BUT THE DEFENDANTS REFUSES TO ORDER NEW EQUIPMENT AND CONTINUING TO LET THESE INJURIES OCCUR IN VIOLATION OF THE 8TH AMEND. OF THE UNITED STATES CONSTITUTION.



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

DECLARATORY, INJUNCTIVE RELIEF,  
EQUITABLE, APPROPRIATE RELIEF,  
COMPENSATORY/MONEY DAMAGES,  
PUNITIVE DAMAGES,  
SUCH OTHER OR FURTHER RELIEF AS THIS COURT DEEMS APPROPRIATE

VI. The plaintiff demands that the case be tried by a jury.



YES



NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 13 day of DECEMBER 2020

(Signature of plaintiff or plaintiffs)

ERIC EIBERNARD  
(Print name)

R25398  
(I.D. Number)

(Address)

PREPARED BY: DARRIN FIELDS  
(SEE ATTACHMENT "A")

# AFFIDAVIT

I, DARRIUS FIELDS, R57041

~~I~~ SWEAR UNDER THE PENALTY OF PERJURY THAT ~~THE~~ THAT  
THE CONTENTS ~~OF THIS AFFIDAVIT~~ ~~IS~~ TRUE AND CORRECT:

ON MY OWN FREE WILL I HAVE BEEN HELPING ERIC BERNARD BECAUSE  
I KNOW ERIC BERNARD IS PHYSICALLY IMPAIRED/PARALYSED,  
CANT SIT, CANT WALK, CANT SIT UP OWN HIS OWN, NEEDS  
ASSISTANCE EATING AND ~~UNDER~~ <sup>UNDER</sup> FULL MEDICAL SELF CARE  
ASSISTANCE AND OBSERVATION. I, DARRIUS FIELDS IS ASSISTING  
HIM WITH HIS LEGAL AFFAIRS SINCE HE HAS NO ONE TO  
ASSIST HIM. HOWEVER, I AM NOT UNDER ANY OBLIGATION  
TO DO SO, I DO NOT PLAN ON BEING ABLE TO ASSIST PLAINTIFF  
~~THE~~ DUE TO MY SERIOUS HEALTH ISSUES AND  
I WILL NOT BE AVAILABLE TO ASSIST MR BERNARD. JUST  
SO THIS COURT IS AWARE THAT I AM HAND ~~IN~~ WRITING  
AND PREPARED ALL OF HIS FILED DOCUMENTS

Darius Fields  
DARRIUS FIELDS  
AFFIANT

SUBSCRIBED AND SWORN BEFORE ME

ON 6 NOV 2020

Patrick Shippert  
NOTARY



ATTACHMENT: LITIGATION HISTORY IBPAECS  
 [If you need additional space for ANY section, please attach an additional sheet and reference that section.]

PLAINTIFF MAY HAVE MORE PENDING LITIGATIONS BUT DON'T KNOW THE PROPER INFORMATION

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: BERNARD V. ~~SCOTT~~ SCOTT ETAL  
No. 3:15-CV-50277
- B. Approximate date of filing lawsuit: OCTOBER 2016
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases:  
ERIC BERNARD
- D. List all defendants: BALLARD, COOK, EMMER, FLOYD, FOX, HABERKAMP,  
KING, KLEIN, MALONE, McROBERT, PARNOW, SCOTT, SMITH, DEKALB  
COUNTY JAIL
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): DEKALB COUNTY, ILLINOIS
- F. Name of judge to whom case was assigned: WILL KAPALA
- G. Basic claim made: \_\_\_\_\_
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): SUMMARY OF SUBMITMENT PENDING
- I. Approximate date of disposition: UNKNOWN

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: 2018 MS-000047  
2<sup>nd</sup>
- B. Approximate date of filing lawsuit: 2018
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC E. BOWMAN
- D. List all defendants: MICHAEL MCLEOD, DONNA JONES, ANDREW TILDEN, JOHN AND JANE DOES
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): LIVINGSTON COUNTY
- F. Name of judge to whom case was assigned: BAUKORT
- G. Basic claim made: 8<sup>th</sup> AND 14<sup>th</sup> AMENDMENT VIOLATION
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): STILL PENDING, DISMISSED WITHOUT PREJUDICE, PLAINTIFF WAS PARALYZED AND UNABLE TO PROCEED WHILE HOSPITALIZED  
JANUARY 2019
- I. Approximate date of disposition: 2019 (NOVEMBER) DATE

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- BERNARD v. MELVIN, NO. 18-CV-01333
- A. Name of case and docket number: ERIC E. BERNARD - V -  
MICHAEL MELVIN, SHARON SIMPSON, LINDA CORELL,  
OFFICER SWISLER, ANDREW TILDEN, CHER HANSEN ) NO. 18-CV-01333
- B. Approximate date of filing lawsuit: \_\_\_\_\_
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC EUGENE BERNARD AKA TERRELL KING
- D. List all defendants: MICHAEL MELVIN, SHARON SIMPSON,  
SWISLER, ANDREW TILDEN, CHER HANSEN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT, CENTRAL ILLINOIS
- F. Name of judge to whom case was assigned: JAMES SHADID
- G. Basic claim made: DOMESTIC 8<sup>TH</sup> AND 14<sup>TH</sup> AMENDMENT VIOLATION
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: Still PENDING

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



- IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):
- A. Name of case and docket number: ERIC BERNARD - V - JOHN BALDWIN, NO. 18-MR-183
  - B. Approximate date of filing lawsuit: 2018 (UNKNOWN EXACT DATE)
  - C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC E. BERNARD, AKA TERRELL KING
  - D. List all defendants: ANGLIN, ATKIN, BALDWIN, SCRAFF, BAPTIST, BENNER, BENNET, BOGGESS, CALDWELL, CULKIN, CULMANN, DUCKWORTH, EVANS, FOX, GORE, HANSEN, JOHNSON
  - E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): LIVINGSTON COUNTY STATE OF ILLINOIS
  - F. Name of judge to whom case was assigned: BUNKERT
  - G. Basic claim made: 45th 14th AMENDMENT VIOLATION
  - H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING FOR APPEAL
  - I. Approximate date of disposition: TO BE DETERMINED

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: BERNARD V. CASTELL ET AL  
No 1:19-cv-01001-COB
- B. Approximate date of filing lawsuit: \_\_\_\_\_
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC BERNARD
- D. List all defendants: KEVIN CASTELL AND OFFICER  
VAGIN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FILED IN NORTHERN ILLINOIS DISTRICT  
BUT TRANSFERRED TO CENTRAL DISTRICT ILLINOIS
- F. Name of judge to whom case was assigned: UNKNOWN
- G. Basic claim made: \_\_\_\_\_
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): WITHOUT PREJUDICE DISMISSED
- I. Approximate date of disposition: MARCH 2019

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: BERNARD -V- MELVIN  
NO. 18-MR-46
- B. Approximate date of filing lawsuit: 2018 (UNKNOWN DATE)
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC BERNARD
- D. List all defendants: MICHAEL MELVIN, EMILY RUCKEN  
TERRI KENNEDY, LT. EVANS, OFFICER CLAY, PITTMAN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): STATE OF ILLINOIS, LINCOLN COUNTY
- F. Name of judge to whom case was assigned: BADKURT (?)
- G. Basic claim made: 8th AND 14th AMENDMENT VIOLATIONS
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): DISMISSED WITHOUT PREJUDICE, PLAINTIFF  
BECAME PARALYZED
- I. Approximate date of disposition: JANUARY 2020

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: BERNARD v. J.D.D.C. 20-CV-5347
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC E. BERNARD  
ALIAS TERRELL KING
- D. List all defendants: J.D.D.C., JEFFREYS, MILES, WILLIAMS,  
BARNES, JANE DOES, JOHN DOES, OTHER UNKNOWN DEFENDANTS
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JOHN ROBERT BLAKEY
- G. Basic claim made: 8TH, 14TH AMENDMENT VIOLATIONS
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: UNKNOWN

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: BERNARD V. SCHWAB REHABILITATION  
20 CV 05373 (JOINED) 05355
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC BERNARD  
ALIAS TERRELL KING
- D. List all defendants: SCHWAB REHABILITATION HOSPITAL, MICHAEL GITTER,  
FABIOLA SEQUERIA KOPP, DR. ELI, DR. VINCE, BETSY GERTZ,  
JOHN DOES AND JANE DOES BOTHER UNKNOWN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JOHN ROBERT BLAKELY
- G. Basic claim made: DELIBERATELY \*INDIFFERENCE TO SERIOUS MEDICAL  
NEED, CRUEL UNUSUAL PUNISHMENT.
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PREVIOUSLY VOLUNTARILY DISMISSED
- I. Approximate date of disposition: UNKNOWN

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: BERNARD V. ILLINOIS DEPARTMENT OF CORRECTION 20-CV-50407
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERICE BERNARD, ALIAS TERRELL KING
- D. List all defendants: U.S.D.C., ROB ECKFELT, JOHN VARGA, SONJA NICKINIS, LT GANER, SGT SKIP WORTH, WILSON, JAMES, CECILIA GROSSMAN, ADRIAN MONTGOMERY, JAMES GANER, OTHER UNKNOWN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JOHN ROBERT BLAKELY
- G. Basic claim made: CRUEL UNUSUAL PUNISHMENT, EXCESSIVE FORCE
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): ~~DISMISSED~~ VOLUNTARY DISMISSAL
- I. Approximate date of disposition: UNKNOWN

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: BERNARD V. J.D.O.C. 05383
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC E BERNARD ALIAS TERRILL KING
- D. List all defendants: J.D.O.C., JOHN BALDWIN, ROB JEFFREY, SHERMIN MILES, WARDEN WILLIAMS, JANE DOES AND JOHN DOES OTHER UNKNOWN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: 9-10-20
- G. Basic claim made: 8<sup>th</sup> AND 14<sup>th</sup> AMENDMENT VIOLATIONS
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: UNKNOWN

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: BERNARD v. J.D.D.C 20 CV 05382
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC E. BERNARD ALIAS TERRELL KING
- D. List all defendants: J.D.D.C. ROB SCOFFERUS, SONJA NICKLAKE, AMBER ALLEN, MONICA CARPENTER, Dacia HUTCHISON, OFFICER HERNE, ADVANCE MEDICAL SERVICE JOHN DOES, CHAMPAIGN COUNTY, DEPUTY RICHIE JANE DOES OTHER UNKNOWN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JOHN ROBERT BLANK
- G. Basic claim made: DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): VOLUNTARY DISMISSAL W/O PREJUDICE
- I. Approximate date of disposition: 10-23-20

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: BERNARD v. J.D.C. 20-CV-05361
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: J.D.C.  
ROB JEFFREY, TINA TAMMORCS, NURSE JENNIFER, JANE  
DOES, JOHN DOES,  
ERIC BERNARD ALIAS TERRELL KING
- D. List all defendants: J.D.C., ROB JEFFREY, LT WEST, TINA  
TAMMORCS, NURSE JENNIFER, JANE DOES AND JOHN DOES OTHER  
UNKNOWN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JOHN ROBERT BLAKE
- G. Basic claim made: DELIBERATE INDIFFERENCE TO A SERIOUS  
MEDICAL NEED, CRUEL UNUSUAL PUNISHMENT
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PERMANENT VOLUNTARY DISMISSAL
- I. Approximate date of disposition: UNKNOWN

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: BERNARD V. SEFFREUS, ETAL 20 CV 50413 <sup>50413</sup>
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC E. BERNARD ALIAS TERRELL KING
- D. List all defendants: A.D.C. ROB SEFFREUS DAVID SKIDWORTH  
LT. GAWGER JOHN DOES JANE DOES (OTHER UNKNOWN)
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: PAINE D. JOHNSTON
- G. Basic claim made: DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEED
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: ?

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- 05341  
05370  
05350  
JOINED  
05341
- A. Name of case and docket number: BERNARD v. DOL 20 CV 5373
- B. Approximate date of filing lawsuit: \_\_\_\_\_
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC E. BERNARD ALIAS TERRELL KING
- D. List all defendants: 2 D.D.C., JOHN BALDIN, ROB JEFFREY, SHERMAN MILES, B. BARNES, MARCEN WILLIAMS, JOHN DICK, JANE DICK. OTHER UNKNOWN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JOHN ROBERT BLAKEY
- G. Basic claim made: CRUEL UNUSUAL PUNISHMENT, DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEED
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): DISMISSED W/O PREJUDICE
- I. Approximate date of disposition: 10-22-20

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: BERNARD V. J.D.O.C 20 CV 5368
- B. Approximate date of filing lawsuit: SEPTEMBER<sup>10</sup> 2020
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ~~J.D.O.C~~ JOHN BALDWIN, ROB JEFFREYS, SGT. THOMAS, OFFICER JOHNSON, JACQUELINE ARNOLD, JOHN DOE AND JANE DOE, ERIC EBERHARD, ALIASES TERRILL KATH
- D. List all defendants: J.D.O.C, ROB JEFFREYS, SGT. THOMAS, JOHN BALDWIN, OFFICER JOHNSON, JACQUELINE ARNOLD, JOHN DOE, JANE DOE, UNKNOWN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JUDGE JOHN ROBERT BLANKY
- G. Basic claim made: GOSSIP EXCESSIVE FORCE
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: UNKNOWN

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: BERNARD v. DOJ 20-CV-5349
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: DOJ, ROB JEFFREYS, B. BARNES, WILLIAMS, SHERMIN MILES, JANE DOES, JOHN DOES, ERIC BERNARD, TERRELL KINE
- D. List all defendants: DOJ, ROB JEFFREYS, B. BARNES, SHERMIN MILES, WILLIAMS, JANE DOES, JOHN DOES, OTHER UNKNOWN DEFENDANTS
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JOHN ROBERT BLAKELY
- G. Basic claim made: 8TH, 14TH AMENDMENT U.S. CONSTITUTION VIOLATIONS
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: UNKNOWN

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: BERNARD v. ADICETAL 20-CV-50412 <sup>0535</sup>
- B. Approximate date of filing lawsuit: 9-10-20
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ERIC BERNARD  
ALIAS TERRELL KING
- D. List all defendants: A.D.O.C, ROB JEFFREYS, SONJA NICKLAIS,  
AMBER ALLEN, JANE DOES, JOHN DOES, UNKNOWN
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): FEDERAL COURT
- F. Name of judge to whom case was assigned: JOHN ROBERT BLAKEY
- G. Basic claim made: DELIBERATE INDIFFERENCE TO A  
SERIOUS MEDICAL NEED
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: ?

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.